

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:	:	Chapter 9
	:	
CITY OF DETROIT, MICHIGAN,	:	Case No. 13-53846
	:	
Debtor.	:	Hon. Steven W. Rhodes
	:	

**CERTIFICATE OF NO RESPONSE BY BENEFICIAL
HOLDERS OF ASSURED UTGO BONDS TO ASSURED
NOTICE OF ASSERTED RIGHT TO VOTE CLAIMS IN CLASS 8
[DOCKET NO. 5015]**

The undersigned certifies that on May 23, 2014, the *Assured Notice of Asserted Right to Vote Claims in Class 8* [Docket No. 5015] (the “UTGO Voting Notice”)¹ and a Notice and Opportunity to Object, Exhibit 2 to the UTGO Voting Notice, identifying the deadline for responses to the UTGO Voting Notice as June 24, 2014, were filed and served on the Court’s ECF noticing list. See Certificate of Service, Exhibit 4 to the UTGO Voting Notice, attached hereto as **Exhibit B**. The UTGO Voting Notice and the Notice and Opportunity to Object were also made available on the Balloting Agent’s website at: <http://www.kccllc.net/detroit/document/13538461405230000000000009>.

¹ Any capitalized term not defined herein shall have the meaning ascribed to it in the UTGO Voting Notice.

The UTGO Voting Notice was filed pursuant to the *Order (I) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject Plan of Adjustment and (II) Approving Notice Procedures Related to Confirmation of the Plan of Adjustment* [Docket No. 2984] (the “Solicitation Procedures Order”), as amended by the *Fifth Amended Order Establishing Procedures, Deadlines and Hearing Dates Relating to the Debtor’s Plan of Adjustment* [Docket No. 5259] (the “Fifth Amended Plan Procedures Order”). Pursuant to the Fifth Amended Plan Procedures Order and the Notice and Opportunity to Object, any Affected Holder seeking to file a brief in response to the UTGO Voting Notice was required to do so by June 24, 2014.

The Solicitation Procedures Order further provides that “If neither (i) an Affected Holder . . . contests a Notice of Asserted Right to Vote a Claim, the Claiming Party will be granted the relief sought in its Notice of Asserted Right to Vote a Claim.” Solicitation Procedures Order, at ¶ 9.h.

No objections or responses to the UTGO Voting Notice were timely filed.

WHEREFORE, pursuant to the Solicitation Procedures Order and Rule 9014-1(c) of the Local Rules of the United States Bankruptcy Court for the Eastern District of Michigan, the undersigned respectfully requests that this Court enter the order, substantially in the form attached hereto as **Exhibit A**: (i) granting Assured the exclusive right to vote with respect to all claims arising from the Assured

UTGO Bonds; (ii) disallowing any vote cast by any party other than Assured with respect to any claim arising from the Assured UTGO Bonds; and (iii) granting such other and further relief as the Court deems just and proper.

Dated: New York, New York
June 30, 2014

CHADBOURNE & PARKE LLP

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EXHIBITS

Exhibit A Proposed Order

Exhibit B Certificate of Service, Exhibit 4 to UTGO Voting Notice

Exhibit A
Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re: CITY OF DETROIT, MICHIGAN, Debtor.	: : : : : : : :	Chapter 9 Case No. 13-53846 Hon. Steven W. Rhodes
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ORDER AUTHORIZING ASSURED TO VOTE CLAIMS IN CLASS 8

This matter coming before the Court on the Assured Notice of Asserted Right to Vote Claims in Class 8 (the “Voting Notice”), filed by Assured Guaranty Municipal Corp., formerly known as Financial Security Assurance Inc., and Assured Guaranty Corp. (together, “Assured”); and the Court being fully advised in the premises;

IT IS HEREBY ORDERED THAT:

1. Assured is the sole party authorized to vote claims arising from the Assured UTGO Bonds,¹ as set forth in the Voting Notice.

¹ Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Brief of Assured in Support of Notice of Asserted Right to Vote Claims in Class 8.

2. The City shall disregard any votes submitted on the claims arising from the Assured UTGO Bonds by any party other than Assured.

Exhibit B

Certificate of Service, Exhibit 4 to UTGO Voting Notice

Exhibit 4
Certificate of Service

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:

CITY OF DETROIT, MICHIGAN

Debtor.

Chapter 9

Case No. 13-53846

Hon. Steven W. Rhodes

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of May 2014, I caused the *Assured Notice of Asserted Right to Vote Claims in Class 8* to be filed with the Clerk of the Court using the CM/ECF system, which provides electronic notification of such filing to all counsel of record.

Dated: May 23, 2014
New York, New York

CHADBOURNE & PARKE LLP

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